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FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

STRUMWASSER & WOOCHELLP

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FREDRIC D. WOOCHELL
MICHAEL J. STRUMWASSER
RALEIGH H. HARRIS
KEVIN S. REED
SEAN B. HECHT

MAY 20 3 21 PM '99

By Facsimile & U.S. Mail

May 20, 1999

Seth Row, Attorney
Federal Election Commission
999 "E" Street, N.W.
Washington, DC 20463

Re: MUR 4742

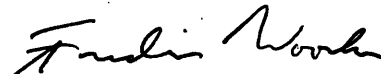
Dear Seth:

As we discussed over the phone this afternoon, I have been retained to represent all of the Respondents — Larry Remer and The Primacy Group; Vargas for Congress '96 and Deanna Liebergot, as Treasurer; Committee to Re-Elect Vargas and Deanna Liebergot, as Treasurer; and San Diego City Councilman Juan Vargas — in the above-entitled MUR 4742. I have enclosed facsimile copies of the Statements of Designation of Counsel for each Respondent; I will forward you the originals of the Designations as soon as I receive them.

On behalf of all Respondents, I request that the Commission agree to pursue and enter into a pre-probable cause conciliation of this matter. As we discussed over the phone, although Respondents vigorously deny the allegations of the complaint, Councilman Vargas has indicated a willingness to expend the time and resources necessary to attempt to raise sufficient funds to pay off the remaining campaign debts of the Vargas for Congress '96 Committee, thereby allaying the concerns expressed in the General Counsel's analyses. In addition, I formally request at least a 30-day extension of time to respond to the Orders to Answer Questions and Subpoenas to Produce Documents that were served on Respondents, in order to allow us to pursue the conciliation in an orderly fashion.

Thank for your cooperation on this matter. I look forward to discussing this further with you or your supervisor, Mr. Calvert.

Sincerely,



Fredric D. Woocher

Enclosures

21.04.493.1593

MAY-20-1999 THU 16:03 ID: 111 015 0156

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RECEIVED
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OFFICE OF GENERAL
COUNSEL**STATEMENT OF DESIGNATION OF COUNSEL**

MAY 24 3 21 PM '99

MUR 4742NAME OF COUNSEL: Fredric D. WoocherADDRESS: STRUMWASSER & WOOCHER LLP100 Wilshire Blvd., Ste. 1900Santa Monica, CA 90401TELEPHONE: (310) 576-1233

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

5/20/99
DateJuan C. Vargas
SignatureRESPONDENT'S NAME: Councilman Juan VargasADDRESS: 3609 Fourth AvenueSan Diego, CA 92103

HOME PHONE: _____

BUSINESS PHONE: _____

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21.04.403.1594

RECEIVED
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OFFICE OF GENERAL
COUNSEL**STATEMENT OF DESIGNATION OF COUNSEL**

May 24 3 21 PM '99

NUR 4742NAME OF COUNSEL: Fredric D. WoosherADDRESS: STRUMWASSER & WOOSHER LLP100 Wilshire Blvd., Ste. 1900Santa Monica, CA 90401TELEPHONE: (310) 576-1233

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

20 MAY 99
Date
SignatureRESPONDENT'S NAME: The Primacy GroupADDRESS: 3609 Fourth AvenueSan Diego, CA 92103

HOME PHONE: _____

BUSINESS PHONE: _____

ATTACHMENT 3
Page 1 of 1

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MAY 24 3 21 PM '99

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4742

NAME OF COUNSEL: Fredric D. Woocher

ADDRESS: STRUMWASSER & WOOCHEER LLP

100 Wilshire Blvd., Ste. 1900

Santa Monica, CA 90401

TELEPHONE: (310) 576-1233

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

20 MAY 99
Date


Signature

RESPONDENT'S NAME: Committee to Re-Elect Vargas

ADDRESS: 3609 Fourth Avenue

San Diego, CA 92103

HOME PHONE: _____

BUSINESS PHONE: _____

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Page 1 of 1

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STATEMENT OF DESIGNATION OF COUNSEL

MAY 24 3 21 PM '99

MUR 4742

NAME OF COUNSEL: Fredric D. Woocher

ADDRESS: STRUMWASSER & WOOCHEER LLP

100 Wilshire Blvd., Ste. 1900

Santa Monica, CA 90401

TELEPHONE: (310) 576-1233

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

20 May 1999
Date

Deanna Luberg
Signature

RESPONDENT'S NAME: Vargas for Congress '96

ADDRESS: 3609 Fourth Avenue

San Diego, CA 92103

HOME PHONE: _____

BUSINESS PHONE: _____

ATTACHMENT 3
Page 1